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# DALLAS D. BALL, P.C.

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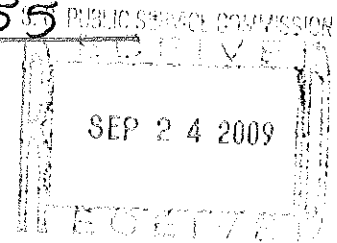
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September 17, 2008



Charles L.A. Terreni  
S.C. Public Service Commission  
Synergy Business Park  
101 Executive Center Drive  
Columbia, S.C. 29210

RE: Limousine Companies of South Carolina Petition to Cease and Desist the  
Issuance of Dual Authority

Docket Number 2009-385-T

Public Service Commission:

On behalf of the more than 500 taxis operated by the following companies: Checker Yellow Cab Co., Inc., Yellow Cab Co. of Greenville, Inc., Yellow Cab Co. of Anderson Inc., The Original Blue Ribbon Taxi Cab Co., Inc., Yellow Cab Co. of Charleston, Inc. and North Area Taxi Co., Inc., I want to support the limousine companies' petition to cease the issuance of dual authority. All of the above listed companies have experienced problems with dual authority. These vehicles can swing from taxi to limo and back to taxi without the riding public, insurers, or regulatory authorities knowing. This creates confusion and allows some operators to disregard existing laws and regulations much to the public's and taxi industry's detriment. Companies with dual authority are believed to be procuring insurance on the representation that they are limousine companies as opposed to taxi companies which carry a higher rate. Whether the riding public is covered under these "Limousine Policies" after the insurer discovers its insured was operating as a taxi as opposed to a limousine is unclear. There are severe problems in Charleston, Columbia, and Greenville with vehicles plated with LS tags operating as taxicabs.

At the Greenville Spartanburg Airport, vehicles bearing LS tags sit outside the terminal building waiting on fares in a demand response fashion priced on a per trip basis. These vehicles are unmarked but are clearly operating as taxicabs despite their registration as limousines. In Charleston, the city is filled with vehicles bearing LS tags which operate on a demand response basis and charge on a per trip basis. At the Columbia Metropolitan Airport, vehicles bearing LS tags receive preferential treatment



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while waiting for fares in the "Limousine" line but their operations are on a demand response basis with pricing determined on a per trip basis making them taxicabs not limousines.

In all three situations, vehicles are receiving the benefits of the limousine regulatory structure (lower insurance premiums, less restrictive inspections and unregulated rates and disclosures) without actually operating as limousines. These rogue vehicles compete with and damage legitimate taxi companies which pay higher business license fees and dodge the more significant regulatory framework designed for the protection of the public.

We join in the request for the termination of dual authority in South Carolina and ask for appropriate enforcement of vehicles bearing LS tags. Thank you for your attention to this matter.

Sincerely,



Dallas D. Ball

DDB/cb  
attachment